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April 24, 2017

Regional Freedom of Information Officer
U.S. EPA, Region 10
Office of Ecosystems, Tribal and Public Affairs
1200 6th Avenue ETPA-124
Seattle, WA 98101

Re: Freedom of Information Act Request for Model Documentation, Portland Harbor Superfund Site

Dear Regional Freedom of Information Officer:

This is a request for project information under the Freedom of Information Act. I request that a copy of the following documents (listed below, bulleted) or documents containing the following information be provided in either hardcopy or electronic format.

On page H-3 of the Portland Harbor RI/FS Draft Final Feasibility Study, Appendix H EPA Review of Existing and Hydrodynamic and Sediment Transport Model (HST), dated June 2016 (Document ID # 840011), there is the following statement: "*2014: EPA commissioned an independent review of the Lower Willamette Group (LWG) HST model by Portland State University*." A subsequent phone call with Dr. David Jay, a professor at Portland State University, indicated he conducted the review on behalf of EPA but as an independent reviewer (contracted through CDM Smith) and not through Portland State University. He indicated he developed a report with three appendices.

I request a complete copy of this report and appendices, including the draft and revised versions of the first two appendices. The title page of this report states:

- Report titled "Comments on: Lower Willamette Group Portland Harbor Numerical Modeling, Comments by: David A. Jay Professor Department of Civil and Environmental Engineering, Portland State University December 2014."

The three appendices are:

- Appendix I – Willamette River Floods and Hydrology (submitted in 2014 and revised in 2015)
- Appendix II: Lower Willamette River Sediment Load (submitted in 2014 and revised in 2015)
- Appendix III: Columbia River Sediment Load (May 2015)

In the same document on the same page it also states:

- "*2014: ERDC review of the independent review by Portland State University*."

I request a copy of any reports, technical memorandums, emails and supporting information of USACE's Engineer Research and Development Center's (ERDC) review of the independent review by Portland State University (aka Dr. David Jay).

In the same document (Document ID # 840011) on page H-2 it states:

"*At EPA's request, the LWG provided the HST model to ERDC, which performed a detailed review and diagnostic analysis. Further analysis using a linked version of the modeling framework conducted by ERDC indicated that the FS model predicted greater deposition than the linked model (defined as greater than 0.5 ft) in 55 percent of the model grid cells, with results ranging from 6 inches to greater than 20 feet more deposition. The evaluation also indicated that the linked and unlinked models show similar deposition (+/- 0.5 ft) in 40 percent of the cells and the FS model showed less deposition (or greater scour) than the linked version of EFDC in 5 percent of the cells. This evaluation demonstrated a strong bias for greater deposition by the MNR model used in the FS.*"

Based on conversations in 2016 and 2017 with Dr. Earl Hayter of USACE ERDC, it is my understanding that the ERDC review cited above for the Portland Harbor Superfund Site was conducted by Earl Hayter using the Sandia National Laboratories version of the EFDC model which includes geomorphic feedback.

I request digital copies of all model files (in their original data format) provided to Dr. Earl Hayter and developed by Dr. Earl Hayter to conduct the "detailed review and diagnostic analysis." This includes but is not limited to:

- The model files and documentation provided to Dr. Hayter.
- Documentation of Dr. Hayter's scope of work for his review.
- Dr. Hayter's model files for the Sandia National Laboratories version of the EFDC model of Portland Harbor (including, input files, output files, model codes and executables).
- Dr. Hayter's files regarding the hydrodynamic calibration checks he completed and any sediment transport calibration checks he may have completed.
- Any reports, technical memorandums, emails, or PowerPoint slide decks which document his analysis and findings.

We understand that Earl Hayter has these documents readily available but needs approval before releasing the information.

Thank you for your consideration of this request. We hope these documents will help inform the next phase of work associated with the pre-design studies for the Site. If you have any questions regarding this request, please do not hesitate to contact me at rannear@geosyntec.com or (503)-222-9518 or Elizabeth Weaver legal counsel for ExxonMobil at elizabeth.weaver@nortonrosefulbright.com and (213)-892-9290.

Sincerely,

Robert Annear, PhD, PE
Senior Principal
Geosyntec Consultants

Cc://
Sean Sheldrake, Regional Project Manager, Region 10
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